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THE ATCHISON, TOPEKA AND SANTA FE RAILWAY COMPANY

1700 East Golf Road Schaumburg, Illinois 60173-5860

Writer's Direct Dial (708) 995-6810



VIA OVERNIGHT DELIVERY

November 10, 1994

Ms. Linda Beasley
Enforcement Specialist
U.S. EPA - Region V
Emergency Support Section HSE-5J
77 West Jackson Blvd.
Chicago, IL 60604

Re: Conservation Chemical Company of Illinois, Inc. Site, Gary Indiana - General Notice of Potential Liability

Dear Ms. Beasley:

This is in response to the General Notice of Potential Liability which Santa Fe Railway received on November 3, 1994, with respect to the above referenced site.

Santa Fe Railway had conducted an extensive investigation of this matter several years ago in response to inquiries from a group of potentially responsible parties otherwise known as the 6500 Industrial Highway Group. Santa Fe Railway concluded that it has no liability under the Comprehensive Environmental Response, Compensation, and Liability Act, in that it merely provided transportation services as a common carrier by rail within the meaning of Section 107(b)(3). I enclose for your review a copy of the response which Santa Fe Railway provided to the 6500 Industrial Highway Group.

Unless you have information to the contrary, Santa Fe Railway's position is unchanged. Please review the enclosure with its attendant documents and advise whether you have any questions or comments. Given the apparent urgency of the Agency's mission, we could be available to meet with you and clarify this misunderstanding. Please contact Robert Cowell of this office (708/995-6817) to arrange such a meeting. Thank you for your consideration.

Very truly yours,

Pamela Nehring General Attorpey

Enclosure

lwenvir\wp\beasley.ltr

cc: Ms. Cynthia N. Kawakami (w/encl. via overnight express)
 Mr. M. P. Stehly
 Mr. D. C. Clark
 Mr. R. C. Cowell



The Atchison, Topeka and Santa Fe Railway Company

80 East Jackson Boulevard Chicago, Illinois 60604

Writer's Direct: (312) 786-6804

September 14, 1988

Joseph E. Costanza, Esq. Burke, Murphy, Costanza & Cuppy First National Bank Building 720 W. Chicago Avenue East Chicago, Indiana 46312

> Re: Conservation Chemical Company of Illinois, et al. Environmental Protection Agency Region V Administrative Order under Section 106 of CERCLA

Dear Mr. Costanza:

This is in response to your letter dated August 15, 1988, requesting that The Atchison, Topeka and Santa Fe Railway Company ("Santa Fe") pay a share of the cleanup costs which the 6500 Industrial Highway Group has incurred at the Conservation Chemical Company of Illinois, Inc. ("CCCI") Superfund Site in Gary, Indiana. In response to your request, Santa Fe is enclosing documentation received from the United States Environmental Protection Agency ("EPA") which indicates that Santa Fe merely acted as a common carrier in shipments by CCCI during the period from July to December, 1974. The EPA documentation contains no evidence that Santa Fe was a generator of wastes disposed of at the CCCI site or a transporter which selected the site for disposal of hazardous wastes. Based on this information, Santa Fe requests the 6500 Industrial Highway Group to remove Santa Fe from further consideration as a Potentially Responsible Party ("PRP") for costs of cleanup at the CCCI site.

Santa Fe is one of the parties which received notification from the 6500 Industrical Highway Group in March, 1987 that it was considered a PRP for disposal of cyanide wastes at the CCCI site based upon EPA Records. We attended the March 25, 1987 meeting in Chicago and subsequently contributed \$250.00 to participate in the "Potentially Responsible Party Committee".

Pursuant to the Freedom of Information Act, Santa Fe requested that EPA provide it with any and all EPA Records which indicate that Santa Fe Railroad was a generator at the site, as asserted at the March, 1987 meeting. EPA's response

(the "EPA Records") consists of a Trip Report Log for September, 1974 and Bills of Lading between July and December, 1974. The EPA Records contain no invoices or accounting records indicating payment by Santa Fe to CCCI for disposal of any wastes, and no evidence that Santa Fe was a generator of wastes disposed of at the site or a transporter which selected the CCCI site for disposal of hazardous wastes.

The EPA Records were separated by EPA into "incoming transactions", "non-transactional", and "outgoing transactions". Based solely upon the Bills of Lading, EPA apparently attributed generator status to Santa Fe for "incoming transactions".

A chronological summary of the EPA Records is attached for reference. The Trip Report Log and the Bills of Lading establish that Santa Fe was a common carrier transporter of CCCI materials. The EPA Records indicate that between July and December, 1974, fourteen (empty) 40-foot vans were picked up from Santa Fe's Check Point for CCCI's use in piggyback service to Kansas City, and three vans containing cyanide wastes were delivered to Santa Fe for shipment. Bill of Lading 19439 on July 30, 1974 indicates consignment to Santa Fe of 80 cyanide drums for shipment; the comment "Mate to Follow 7-31-74" and "Do Not Ship Alone" refers to a special rate Santa Fe, as a common carrier, offered to shippers including CCCI for shipments of two trailers at one time. No Bill of Lading or Trip Log was provided with the EPA Records for a July 31, 1974 shipment. The Trip Log for September, 1974, shows two vans of 55-gallon drums "out" for shipment on Santa Fe. The EPA Records concern transportation between CCCI and Santa Fe's Chicago facility; none concern the actual movement of CCCI's shipments on Santa Fe to or from Kansas City, although this activity is reflected in the records as a whole.

On two occasions, Santa Fe apparently rejected and returned nonconforming shipments to CCCI prior to transportation in common carrier service, and EPA mischaracterized the rejections as "incoming transactions" to CCCI. The shipments which EPA denoted as "incoming transactions" were in September and December, 1974.

The CCCI trip report log for September, 1974, EPA record No. 6 0091, indicates that on September 24, 1974, 75 55-gallon drums of cyanide were sent "out" to Santa Fe Railroad for shipment by CCCI pursuant to Bill of Lading 19891. (There is no corresponding Bill of Lading for this transaction in the EPA Records provided to Santa Fe.) The notation adjacent to the commodity description of cyanide drums for this trip report is the term "out" and the trailer is shown as a van. This refers to an outbound load from the CCCI, Gary, Indiana location and means the Santa Fe was the common carrier for movement of a trailer of material for the shipper, CCCI.

The trip report log also indicates that on September 26, 1974, 78 55-gallon drums of cyanide were sent "out" to Santa Fe Railroad for shipment by CCCI pursuant to Bill of Lading 19903. (There also is no corresponding Bill of Lading for this transaction in the EPA Records provided to Santa Fe.)

On the same date, September 26, 1974, Bill of Lading 19909 and the corresponding CCCI September trip report log entry show three 55-gallon drums picked up by CCCI from Santa Fe at the Transfer Track at 3633 West 38th Street. The Transfer Track is operated by Santa Fe's station employees who handle problem loads tendered by shippers. The shipping description for Bill of Lading 19909 contains the following language in parentheses: "Drums which were removed from 40foot van brought in 9-24-74". It is evident from this information that Santa Fe rejected three drums of cyanide tendered with the September 24, 1974 shipment to Kansas City and transferred them to the Transfer Track for pickup and correction by the shipper. The Bills of Lading and trip report log indicate that CCCI picked up the three rejected drums when it tendered another shipment to Santa Fe on September 26, 1974.

Shippers must comply with the applicable Department of Transportation regulations on packaging under 49 CFR Parts 173, 178, and 179, before offering hazardous materials for transportation. Blocking and restraining methods for rail freight promulgated by the American Association of Railroads have been in effect since 1961. If a shipment tendered to Santa Fe did not meet these requirements, Santa Fe inspectors would reject the nonconforming shipments and hold them for the shipper for correction.1

Santa Fe's rejection of items tendered for shipment and holding them for pickup and correction by the shipper does not constitute "generation" of wastes by any definition. Santa Fe merely acted within its role as common carrier in rejecting the shipments and there is no evidence that Santa Fe had any role in generation, selection of a disposal site, or disposal of the materials, whether at the CCCI site or elsewhere.

l Since the enactment of RCRA in 1976, generators, including owners or operators who initiate a shipment of a hazardous waste from a treatment, storage, or disposal facility, have been required to package hazardous wastes in accordance with the DOT regulations, pursuant to 40 C.F.R. §262.30. Additionally, Pamphlet 6-C of the Association of American Railroads sets forth the Approved Methods for Loading and Restraining Shipments of Hazardous Materials for Trailer/Container on Flat Car (TOFC-COFC) Movements, also known as piggyback movements.

It should be noted that each Bill of Lading in the EPA Records was prepared by CCCI. Each Bill of Lading indicates in the signature section that CCCI was the Shipper, and Bill of Lading 19909 is no different. Therefore, there is no evidence that Santa Fe had any role in selection of a disposal site for CCCI's shipment.

The "from" and "consigned to" sections in the Bill of Lading prepared by CCCI merely indicate where transportation originated and ended. To interpret consignment to CCCI from Santa Fe as evidence of disposal, would mean that every empty 40-foot van picked up for CCCI's use in piggyback service to Kansas City would have been intended for disposal. Similarly, to assume that, because CCCI prepared a bill of lading showing that materials "from" Santa Fe were "consigned to" CCCI, then Santa Fe was a generator of the materials which were to be disposed of at the facility, is an untenable, leap in logic. There is no evidence of disposal of the materials in the EPA Records.

If Santa Fe had generated the materials, it would have been the shipper to CCCI's facility, and it would have records of payment for disposal. Santa Fe has researched its accounting records and has found no records of any payments to CCCI for disposal of any cyanide wastes. An invoice or receipt concerning such a payment should also be included in the EPA Records concerning the transaction. However, no such record was provided to Santa Fe in EPA's response to its Freedom of Information Act request.

As to the December, 1974 transaction, the documents indicate that the same type of event occurred as in September, 1974, described above. Unlike the September transaction, there is no information concerning the address where the pick up took place and no handwritten remarks to clarify what occurred. However, the Bill of Lading prepared by CCCI shows once again in the signature section that CCCI was the Shipper. Santa Fe has found no records of any payments to CCCI for disposal of any cyanide wastes, and no invoice or receipt concerning such a payment was included in the EPA Records concerning the transaction. The "from" and "consigned to" sections do not in and of themselves establish that any of the materials were disposed of at the CCCI site. Although there is no corresponding trip log for December, 1974 in the EPA Records, there also is no indication that this shipment was not a load presented by CCCI for shipment, rejected by Santa Fe, and subsequently picked up by CCCI for return to its facility for correction. There certainly is no evidence of disposal of the materials at CCCI in the EPA records. Alternatively, it is well-known that Conservation Chemical Company transferred shipments of hazardous wastes between its Kansas City and Illinois facilities, and this may a situation where wastes were transferred from Kansas City to CCCI.

The only conclusion which can result from these facts is that Santa Fe was merely acting as a common carrier in the December, 1974 transaction as in all the other transactions contained in the EPA Records concerning Santa Fe's involvement at the site. There is no evidence that Santa Fe generated the materials. The Bill of Lading establishes that CCCI was the Shipper which selected the CCCI site as the destination. There is no evidence that Santa Fe disposed of any materials at CCCI.

On the basis of the foregoing, Santa Fe believes it would not be held liable for the cleanup expenses associated with CCCI. CERCLA §9607 holds liable only owners and operators of disposal facilities; any persons who arrange for disposal or treatment, or with a transporter for transport for disposal or treatment, of hazardous substances owned or possessed by such person (generators); and transporters which selected the disposal or treatment facilities. Santa Fe's activities with regard to CCCI fall within none of these categories.2

Therefore, Santa Fe requests that the 6500 Industrial Highway Group remove Santa Fe from further consideration as a Potentially Responsible Party ("PRP") at the CCCI site.

Please contact me with any questions you may have concerning this matter.

Very truly yours,

Sarbara J. San Barbara J. Barr

Assistant General Attorney

Enclosure

cc: Mr. J. R. Fitzgerald (Attn: M. P. Stehly)

² CERCLA liability is specifically modified when common carrier service is involved. If Santa Fe never accepted the barrels of cyanide in the "incoming transactions" for transportation, the provisions of CERCLA §9601(20)(B) do not apply. CERCLA §9601(20)(C) exempts common carriers from the term "owner or operator" when a hazardous substance has been delivered by a common or contract carrier to a disposal or treatment facility, and states that the "common or contract carrier shall not be considered to have caused or contributed to any release at such disposal or treatment facility resulting from circumstances or conditions beyond its control". CERCLA 9607(b)(3) also recognizes an exception to liability for acts or omissions of third parties when contractual arrangements arise from a published tariff and acceptance for carriage by a common carrier by rail.

Summary of EPA Records Obtained Pursuant to Freedom of Information Act Request Concerning the Involvement of The Atchison, Topeka and Santa Fe Railway Company

At Conservation Chemical Company of Illinois

	CCCI Bill of		
Date	Lading	Santa Fe Address	Shipping Description
July 6, 1974	19326	3403 W. 39th Street (Check Point)	Pick up 2 40-ft. vans for piggyback service to Kansas City.
July 29, 1974	19435	3403 W. 39th Street (Check Point)	1 40-ft. van to load for piggyback service.
July 29, 1974	19440	3403 W. 39th Street (Check Point)	1 40-ft van for piggyback service.
July 30, 1974	19439	3403 W. 39th Street	80 cyanide drums, mate to follow 7/31/74, "Do not ship alone".
July 30, 1974	19455	No Address Stated	l empty 40-ft. van for piggyback service to Kansas City.
August 2, 1974	19456	3403 W. 39th Street	1 40-ft. van for piggyback service to Kansas City.
August 12, 1974	19530	3403 W. 39th Street (Check Point)	1 40-ft. van for piggyback service to Kansas City.
August 23, 1974	19644	No Address Stated	1 40-ft. van for piggyback service to Kansas City.
September 24, 1974	19891	Trip Report Log Only No corresponding Bill of Lading in EPA Records	75 55-gallon drums cyanide in van - out.
September 24, 1974	19888	No Address Stated	1 40-ft van for piggyback service to Kansas City.
September 26, 1974	19903	Trip Report Log Only No corresponding Bill of Lading in EPA Records	78 55-gallon drums cyanide in van - out.
September 26, 1974	19909	3633 W. 38th Street (Transfer Track)	3 55-gallon drums which were removed from 40-ft. van brought in on 9/24/74.

Date	CCCI Bill of Lading	Santa Fe Address	Shipping Description
October 2, 1974	19937	No Address Stated	1 40-ft. van for piggyback service to Kansas City.
November 8, 1974	20212	3403 W. 39th Street (Check Point)	1 40-ft. van for piggyback service to Kansas City.
November 8, 1974	20213	3403 W. 39th Street (Check Point)	1 40-ft van for piggyback service to Kansas City.
November 13, 1974	20234	No Address Stated	1 40-ft. wan for piggyback service to Kansas City.
November 16, 1974	20257	3403 W. 39th Street (Check Point)	1 40-ft. van for piggyback service to Kansas City.
November 22, 1974	20305	No Address Stated	1 40-ft. van for piggyback service to Kansas City.
December 3, 1974	20336	No Address Stated	27 30-gallon drums cyanide 55 55-gallon drums cyanide

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CONSERVATION CHEMICAL COMPANY

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STRAIGHT BILL OF LADING -SHORT FORM-Original-Not Negotiable

BILL OF LADING NO

RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading,



CONSERVATION CHEMICAL COMPANY UF ILLINOIS

SHIPPER'S NO.

CARRIER'S NO CHICAGO, ILLINOIS SANTA FE (CHECK POINT) 3403 W. 39TH STREET AT: FROM NAME OF JULY 29. CCCI 1974 CARRIER CONSIGNED TO (Mail or street address of consignee-For purposes of notification only. CUNSERVATION CHEDICAL COMPANY OF ILLINOIS 6500 INDUSTRIAL HIGHWAY DESTINATION STATE COUNTY **INDIANA** LAKE GAKY, ROUTE (To be filled in only when shipper desires and governing tariffs provide for delivery thereat.) P.O. NO. DELIVERING CARRIER CAR OR VEHICLE INITIALS & NO. 247 CCCI NO. PACTAGES WEIGHT SUL TO COR CLASS OR BATE DESCRIPTION 1 40 Ft. Box Vans to load for PiggyBack service Santa Fe SANTA FE K. MUSSER CCCI Agent, Per Shipper, Per DEPART 33 c TERMINAL ARRIVE TERMINAL OUT Meller 8/ TOTAL 14259 DRIVER'S SIGNATUR TIME ARRIVE DELAY AT TERMINAL REMARKS: PLANT START LOAD FINISH LOAD DEPART //30 TOTALTIME MIN.

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STRAIGHT BILL OF LADING - SHORT FORM - Original - Not Negotiable

BILL OF LADING NO.

RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading,

19440



CONSERVATION CHEMICAL COMPANY UF ILLINOIS

SHIPPER'S NO

the property described below, in apparant good order, except as noted (contents and condition of packages inflinews), marked, cornigened, and destined as indicated below, which said cornier (the word corner being understand the new packages). The contract as meaning any persons or corporation in passassions of the property under the contract of packages of carrier of an activate to said destination. It is markedly agreed, as to each corner of all or any of said property over all or any persons of said route to destination, and as to each party as any times interested in all any persons that every service to be performed horizontal packages and the said packages of the contract of the contract of the contract all the saids better the contract and the contract all the saids better the packages of the contract all the saids of the contract all the contract all the contract all the contract all the contract all the contract all the contract all the contract and contract

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STRAIGHT BILL OF LADING -SHORT FORM-Original-Not Negotiable

BILL OF LADING NO.

RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading,

19455



CONSERVATION CHEMICAL COMPANY OF ILLINOIS

SHIPPER'S NO.

the property described below, in apparent good order, except as need (contents and condition of packages unknown), marked, consigned, and destined as indicated below, which said corrier (the word corrier being understood friesdybut this contract as meaning any person or corporation in passassies of the property under the contract) agrees to corry to its usual place of delivery as tend destination, if on its seeds, otherwise to deliver to enter the seed person, and as to each perty of any tens entered is offer any of tend property, that every service to be performed horsunder shall be subject to differ the tens, and conditions of the Uniform Demostre Straight fell of Lading set Service (1) in Uniform Freight Classification in office on the date hereof, if this is a risk or a real-verter tripment, or (2) in the applicable make any described and to leding, exception that are not appeared to the set of leding set the set of the set of leding set of leding set of l

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ORIGINAL

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STRAIGHT BILL OF LADING -SHORT FORM-Original-Not Negotiable

BILL OF LADING NO.

RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading.

19456



CONSERVATION CHEMICAL COMPANY OF ILLINOIS

SHIPPER'S NO

AT: CHIC	AGO. ILLINOI	S FRO	M SANTA FE	RAILROAD	3403₩.	39TH S	TREET		
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STRAIGHT BILL OF LADING — SHORT FORM—Original—Not Negotiable	STRAIGHT BILL	OF LADING -	_SHORT FORM_	-Original-No	t Negotiable
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BILL OF LADING NO.

ECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading.

19644



CONSERVATION CHEMICAL COMPANY

SHIPPER'S NO

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ORIGINAL

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USER RECEIVING TRAILER BY

DULY AUTHORIZED AGENT OF USER BY DULY AUTHORIZED AGENT OR USER BY

SANTA FE BY

WEIGHED ON FAIRBANKS MORSE PRINTOMATIC Number 200414 Customer's Name Construction Chemical Address Commodity 18 19694 Ibs. Gross 2 7 2 8 9 Ibs. Tare Ibs. Net @ Per Ib. Price Shipper Chemical Marce Cat. 080715 (\$12116)

THIS MEMORANDUM is an acknowledgment that a bill of lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for Filing or record.

RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading,

19456



CONSERVATION CHEMICAL COMPANY

SHIPPER'S NO:

the property described below, at appeared good order, accept as noted (contents and condition of packages unknown), merked, consigned, and destined in indicated below, which told corrier (the worst corrier being undersoond throughout this contract as measuring any persons or comparison in passassion of the property which the contract) agrees to carry to in usual places of destine) or total destination. It is mutually agreed, as to each corrier of all or any of said property over all or or any persons of the south party of any time invested in all or any of said property, that as any said and the said to the said of the sai

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OFFICE COPY

STRAIGHT BILL OF LADING - SHORT FORM - Original - Not Negotiable

BILL OF LADING NO.

RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading,

19888



CONSERVATION CHEMICAL COMPANY UF ILLINOIS

SHIPPER'S NO.

the property described below, in appearant good order, except on netal (contents and continue of packages unknown), marked, consigned, and destined to indicated below, which said carrier (the word correr being understand throughout this control is meaning any person or competent in a posture on the property indicated agrees to correr the survey place of destination. It is mutually agreed, as to each correr of all or any of said property over all or any person of said results to all or any person or any person or any person of said results are personant formal formal persons and continues or a real-water superior, as (2) in the applicable manager correr desurfication is a motor correr shipment. Shipper hereby carriem that he is familiar with all the terms and conditions of the United Shipper hereby carriem that he is familiar with all the terms and conditions of the United Shipper and conditions are hardly agreed to by the shipper and excepted for himself and the sample of the shipper and excepted for himself and conditions are hardly agreed to by the shipper and excepted for himself and the assessment of personance of personance or properties and conditions only.

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COPY 6, DRIVER

STRAIGHT BILL OF LADING—SHORT FORM—Original—Not Negotiable
RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading,

19937



CONSERVATION CHEMICAL COMPANY

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STRAIGHT BILL OF LADING —SHORT FORM—Original—Not Negotiable

FROM

(CHECK POINT) 3403 W. 39th Street



AT: CHICAGO, ILLINDIS

CONSERVA ! ON CHEMICAL COMPANY

SHIPPER'S NO.

SANTA FE RAILROAD

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THIS MEMORANBUM is an acknowledgment that a bill of lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading,

BILL OF LADING NO.

20213



CONSERVATION CHEMICAL COMPANY

SHIPPER'S NO.

OF ILLINOIS

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STRAIGHT BILL OF LADING—SHORT FORM—Original—Not Negotiable

BILL OF LADING NO.

20234



CONSERVATION CHEMICAL COMPANY

SHIPPER'S NO.

CARRIER'S NO.

AT: CHICAG	O, ILLINOIS	FRO	M SA	NTA FE	RAILROA	D				
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STRAIGHT BILL OF LADING - SHORT FORM - Original - Not Negotiable

BILL OF LADING NO.



RECEIVED, subject to the classifications and tariffs in effect on the date of issue of this Original Bill of Lading, CONSERVATION CHEMICAL COMPANY

AT:	CHICAGO. I	LLINDIS	FRO	OM SANTA	FE RAILROAD (C	HECK POINT) 34	03 W.	34TH STR	ET
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STRAIGHT BILL OF LADING—SHORT FORM—Original—Not Negotiable

20305



CONSERVATION CHEMICAL COMPANY

OF ILLINOIS

AT:	CHICAG	D, ILLIN	1015	FROM	SA	NTA F	E RAILROA	D					
	BOVEMB	ER 22,	1974							ARR		CCCI/	RA ILROAD
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Outgoing Transactions File

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AW DEPARTMENT

STRAIGHT FILL OF LADING —SHORT FORM—Original—Not Negotiable

BILL OF LADING NO.

19439



CONSERVATION CHEMICAL COMPANY

SHIPPER'S NO.

AT: GARY	INDIANA_	••	SERVATION CHEMI	CAL COMPANY	OF IL	LINOIS	CARRIER'S NO.	
	JLY X29, 30 1	974			NAME	OF CL	:uI	
CONSIGNED T	O		(Mail or street address of ca	ensign es F or purposes	of notificat	ion only.)	Subject to Section 7 of conditions of applicable bull of lading, if the	
	A FE RAILROAU	3403_1	U. 39TH STREET				shipment is to be delivered to the scannighos without recourse on the	
DESTINATION			STATE	C	OUNTY		the following statement. The corrier shall not make	
ROUTE CHILI	AGO.		ILLINOIS (To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)					
KOUTE		(To be tilled in only v	when shipper desires and gove P.O.	• •	or delivery 1	herest.)		
DELIVERING C	ARRIER		CAR OR VEHICLE	NITIALS & NO.			1	
CCCI					24	7 Va	(Signature of consignar.)	
NO. PACKAGES		DESCRIPTION		WEIGHT SUIL TO COIL	CLASS OR RATE	CHECK	If charges are to be graped	
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54	55 GALLON DRU	ms cyanide					Agent or Conting	
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WAN TRANSACTION AC

STRAIGHT BILL OF LADING - SHORT FORM - Original -- Not Negotiable



CONSERVATION CHEMICAL COMPANY

SHIPPER'S NO.

od and his empts. CARRIER'S NO. GARY, INDIANA 650U INDUSTRIA FROM CONSERVATION CHEMICAL COMPANY OF ILLINUIS AUGUST 12, 1974 CARRIER CCCI CONSIGNED TO (Mail or street address of consignor-for purposes of notification only.) **GANTA FE RAILROAD** CHECK POINT 3403 W. 39TH STREET DESTINATION COUNTY CHICAGO, ILLINOIS ROUTE (To be filled in only P.O. NO. DELIVERING CARRIER CAR OR VEHICLE INITIALS & NO. CCCI 247 WEIGHT SUR TO COR NO. PACKAGES DESCRIPTION 40 FOOT BOX BAN FOR PIGGY BACK-SERVICE TO KANSAS CITY SFT2 200 454 CCCI Shipper, Per K MUSSER SANTA FE Agent, Per DEPART ARRIVE TERMINAL OUT TOTAL TIME ARRIVE DELAY AT TERMINAL REMARKS: PLANT START LOAD FINISH LOAD DEPART PLANT TOTAL TIME HRS MIN IN PLANT

ORIGINAL

HIS SHIPPING ORDER must be legibly filled in, in Ink, Indellible Pencil, or in

BILL OF LADING NO.

Carbon, and retained by the Agent

19530



TOTAL TIME

HRS.

CONSERVATION CHEMICAL COMPANY

SHIPPER'S NO

with below, in apparent good order, except as nated (compine and condition of packages unknown), marked, consigned, and demand as indicated below, which said carrier (

AUSUST 12, 1974

AUSUST 12, 1974

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